

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SUSQUEHANNA RADIO LLC

Plaintiff

v.

JACOB KEMP and DANIEL MCDOWELL

Defendants

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CIVIL ACTION NO. 3:23-CV-01746-S

DEFENDANTS' MOTION FOR LEAVE TO PRESENT WITNESSES REMOTELY

1. Defendants move for leave to present Dan McDowell and Adam Romo remotely for the preliminary injunction hearing set for August 21st, 2023.
2. Mr. McDowell is a litigant. On Monday, he is scheduled to accompany his youngest daughter to start college out of state. He can be available to testify via Zoom or other videoconferencing platform beginning at 12:00 p.m. CDT.
3. Mr. Romo manages a significant advertiser with Plaintiff's radio station. He has knowledge of statements made to him by Mr. McDowell that have been misrepresented by Plaintiff in sworn pleadings. Mr. Romo underwent knee surgery this week and will be unable to attend court in person.

Respectfully submitted,

/s/ Philip Kingston
Texas State Bar No. 24010159

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

Counsel for Defendants requested Plaintiff's counsel's agreement to this motion as to Mr. McDowell. Plaintiff is unopposed. Counsel for Defendants made a later request concerning the motion as to Mr. Romo and has not yet received a reply.

/s/ Philip Kingston